

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 2419
Master Dkt. 1:13-md-02419-RWZ

THIS DOCUMENT RELATES TO:

All Actions

**PLAINTIFFS' STEERING COMMITTEE'S OBJECTIONS
TO THE PREMIER DEFENDANTS' NOTICE OF FILING
OF NOTICES OF DEPOSITION BY WRITTEN QUESTIONS**

Pursuant to Fed. R. Civ. R. 32(d)(3)(c), the PSC objects to the form of the following written deposition questions submitted by the Premier Defendants (Premier Orthopedic And Sports Medicine Associates Of Southern New Jersey, LLC Trading As Premier Orthopedic Associates, Premier Orthopedic Associates Surgical Center, LLC, Kimberly Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Rahul Shah, M.D., Dr. Richard C. Diverniero, M.D. and Richard Strauss, M.D.) [Dkt. No. 2313]:

Question Nos. 6, 7 and 19.

Dated: February 3, 2016

Respectfully submitted,

/s/ Kristen A. Johnson

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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, Kristen A. Johnson, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: February 3, 2016

/s/ Kristen A. Johnson
Kristen A. Johnson, BBO # 667261